

January 21, 2005
GO2-05-014

U.S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, DC 20555

**Subject: COLUMBIA GENERATING STATION, DOCKET NO. 50-397,
REDUCTION OF COMMITMENT TO THE OPERATIONAL QUALITY
ASSURANCE PROGRAM DESCRIPTION**

Dear Sir or Madam:

Energy Northwest, in accordance with 10 CFR 50.54(a)(4), is proposing a change to the NRC approved topical report "Operational Quality Assurance Program Description (OQAPD) (EN-QA-004)" and hereby requests NRC approval because this proposed revision would result in a reduction of commitment.

This revision is necessary to update Appendix III, Additional Quality Program Requirements, Section 2.1.2, regarding Plant Operations Committee (POC) membership. The attachment provides a mark-up of proposed changes.

Appendix III, Section 2.1.2 of the OQAPD currently contains a commitment that states "The manager responsible for plant operations and ISFSI, the POC Chairman, shall appoint, in writing, the POC Vice Chairman, and individual members."

The proposed change to this section would remove the plant manager (the manager responsible for plant operations and ISFSI) from the position of POC Chairman, and allow POC to better perform its function as an on-site independent review committee as described in ANSI N18.7-1976 and endorsed by Regulatory Guide 1.33, "Quality Assurance Program Requirements (Operational)."

ANSI N18.7-1976, Section 4.3.2.3 states, in part, "The chairman (or his duly appointed alternate) shall be present for all formal meetings." Section 4.3.2.4 states "Meeting minutes shall be disseminated promptly to appropriate members of management having responsibility in the areas reviewed." ANSI N18.7-1976 does not specify the position or title of the committee chairman and implies that the responsible manager is not a member of the committee.

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The function of the POC, as stated in the OQAPD, Appendix III, Section 2.1, is to advise the plant manager on all matters related to nuclear safety. This function would be as well served if the POC were independent of the plant manager during formal meetings.

Should the NRC provide written approval of this request or if no response is received from the NRC during the 60 days following this letter, Energy Northwest will implement the changes described in the OQAPD in accordance with 10 CFR 50.54(a)(4)(iv).

Should you have any questions or desire additional information regarding this matter, please call Mr. GV Cullen at (509) 377-6105.

Respectfully,



DK Atkinson
Vice President, Technical Services
Mail Drop PE20

Attachment

cc: BS Mallett – NRC – RIV
BJ Benney – NRC – NRR
TC Poindexter – Winston & Strawn
NRC Sr. Resident Inspector – 988C
RN Sherman – BPA/1399

- 1.1.5 Written records of activities associated with independent technical reviews shall be prepared, maintained, and forwarded to the manager responsible for quality assurance.

2.0 REVIEW AND AUDIT

2.1 PLANT OPERATIONS COMMITTEE (POC)

The POC shall function to advise the manager responsible for plant operations and ISFSI on all matters related to nuclear safety.

- 2.1.1 The POC shall be composed of site operating and engineering personnel.

2.1.2 The manager responsible for plant operations and ISFSI, the POC Chairman, shall appoint, in writing, the POC Vice Chairman, and individual members. The qualifications of all members shall meet the requirements of ANSI/ANS-3.1-1981, Section 4.7.

- 2.1.3 All POC alternate members shall be appointed in writing by the POC Chairman or Vice Chairman to serve on a temporary basis.

- 2.1.4 The Plant Operations Committee shall meet at least once per calendar month and as convened by the POC Chairman or designated alternate.

- 2.1.5 The quorum of the POC necessary for the performance of the POC responsibility and authority provisions of these requirements shall consist of the Chairman or Vice Chairman and four members including alternates. No more than two alternates shall make up the quorum.

- 2.1.6 The POC shall be responsible for:

- a. Review of 10 CFR 50.59 and 10 CFR 72.48 Evaluations associated with ~~procedures and programs required by plant and ISFSI Technical~~ Specifications and changes thereto;
- b. Review of all proposed tests and experiments that affect nuclear safety;
- c. Review of all proposed changes to the plant or ISFSI Technical Specifications;
- d. Review of all proposed changes or modifications to plant or ISFSI system or equipment that affect nuclear safety;

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